



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

Brian Batman  
06-8-3

September 27, 2006

Ms. Catherine Witherspoon  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

ALAMEDA COUNTY  
Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

Re: Proposed Amendments to Airborne Toxic Control Measure (ATCM) for  
Chrome Plating and Chromic Acid Anodizing Operations

Dear Ms. Witherspoon:

CONTRA COSTA  
COUNTY  
Mark DeSaulnier  
Mark Ross  
(Vice-Chair)  
Michael Shimansky  
Gayle B. Uilkema  
(Chair)

The Bay Area Air Quality Management District (BAAQMD) appreciates the opportunity to comment on your staff's proposed amendments to the ATCM for Chrome Plating and Chromic Acid Anodizing Operations. The existing ATCM, along with the Air Toxics "Hot Spots" Program, has provided significant emission reductions of hexavalent chromium, a potent human carcinogen, and established California in a leadership position in this regard. The proposed amendments would strengthen the ATCM and provide a further measure of public health protection.

MARIN COUNTY  
Harold C. Brown, Jr.

NAPA COUNTY  
Brad Wagerknecht

SAN FRANCISCO  
COUNTY  
Chris Daly  
Jake McGoldrick  
Gavin Newsom

The BAAQMD currently has 7 hard chrome plating, and 10 decorative chrome plating facilities, operating within our jurisdiction. Based on our evaluations, the emissions of hexavalent chromium from each of these facilities result in maximum lifetime cancer risks of less than 10 in a million to any individual. Most of these facilities will need to implement additional control measures to comply with the proposed amendments.

SAN MATEO COUNTY  
Jerry Hill  
(Secretary)  
Carol Klatt

We believe that many of our decorative chrome plating facilities may be able to comply with the stringent emission standards in the proposed amendments with the use of fume suppressants and other bath controls without the need for add-on controls. This control option is important in that it may significantly reduce the costs needed to comply with the ATCM. For example, it would obviate the need for the installation of an exhaust hood and ventilation system, which are currently not in place at most Bay Area decorative chrome plating facilities. The proposed amendments allow facilities with throughput levels less than or equal to 200,000 amp-hr/yr to demonstrate compliance without the use of add-on controls.

SANTA CLARA COUNTY  
Erin Garner  
Yoriko Kishimoto  
Liz Kniss  
Patrick Kwok

SOLANO COUNTY  
John F. Silva

SONOMA COUNTY  
Tim Smith  
Pamela Torlatti

Jack P. Broadbent  
EXECUTIVE  
OFFICER/APCO

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For facilities with throughput levels greater than 200,000 amp-hr/yr, the proposed amendments would require decorative chrome platers to use add-on controls. The option to use an alternative requirement to demonstrate compliance using fume suppressants and other bath controls without add-on controls is not provided, even though Section 39666(f) of the California Health and Safety Code requires an air district to approve an alternative method that provides equivalent emission reductions to those required in an ATCM. We believe that ARB should use a "technology neutral" approach in the ATCM that allows facilities to demonstrate compliance with specified emission standards using alternative methods or new technologies that may emerge.

Thank you for your consideration of our comments. If you have any questions or would like to discuss these matters further, please call me at (415) 749-5052 or Brian Bateman, Engineering Division Director, at (415) 749-4653.

Sincerely,

  
Jack P. Broadbent *For*  
Executive Officer/APCO